



Memorandum

To: Nancy Sawka, Oregon Department of Environmental Quality

Date: May 28, 2025

From: Cody Schweitzer, Maul Foster & Alongi, Inc.

Project No.: M0022.01.052

Re: Soil Management Plan: French Drain Cleanout Repair

On behalf of Stella-Jones Corporation (Stella-Jones), Maul Foster & Alongi (MFA) has prepared this memorandum detailing how excavated soils will be managed as part of a French drain cleanout repair at the facility located at 22125 SW Rock Creek Road in Sheridan, Oregon (the Site). This information is being provided to the Oregon Department of Environmental Quality (DEQ) as required under the May 2014 Soil Management Plan Procedures (SMPP) for the Site.

Stella-Jones and MFA understand DEQ approval is required prior to any excavation activities on site. This memorandum includes the following information, as required by the SMPP:

- Description of proposed excavation activities
- Field activities (sampling locations, sample methodology, chemical analysis)
- Soil characterization process

This information is primarily detailed in the SMPP but is summarized in this memorandum in the context of the proposed site activities.

Proposed Excavation Activities

Stella-Jones plans to repair the French drain line cleanout point located in the northeastern corner of the Site (Figure 1). During the most recent cleanout, it was noted that at the cleanout access point, the junction was partially collapsed and restricting flow. An approximate 6-foot by 6-foot hole and 4-feet deep, will be excavated for repair and replacement of the existing junction. Soil excavated during the repair will be used as backfill as much as feasible. Stella-Jones and MFA estimate a minimal amount of material, less than approximately 10 cubic yards, will require characterization and on-site management prior to removal from the Site.



Image 1: French Drain cleanout (looking West) Image 2: French Drain cleanout (looking South)

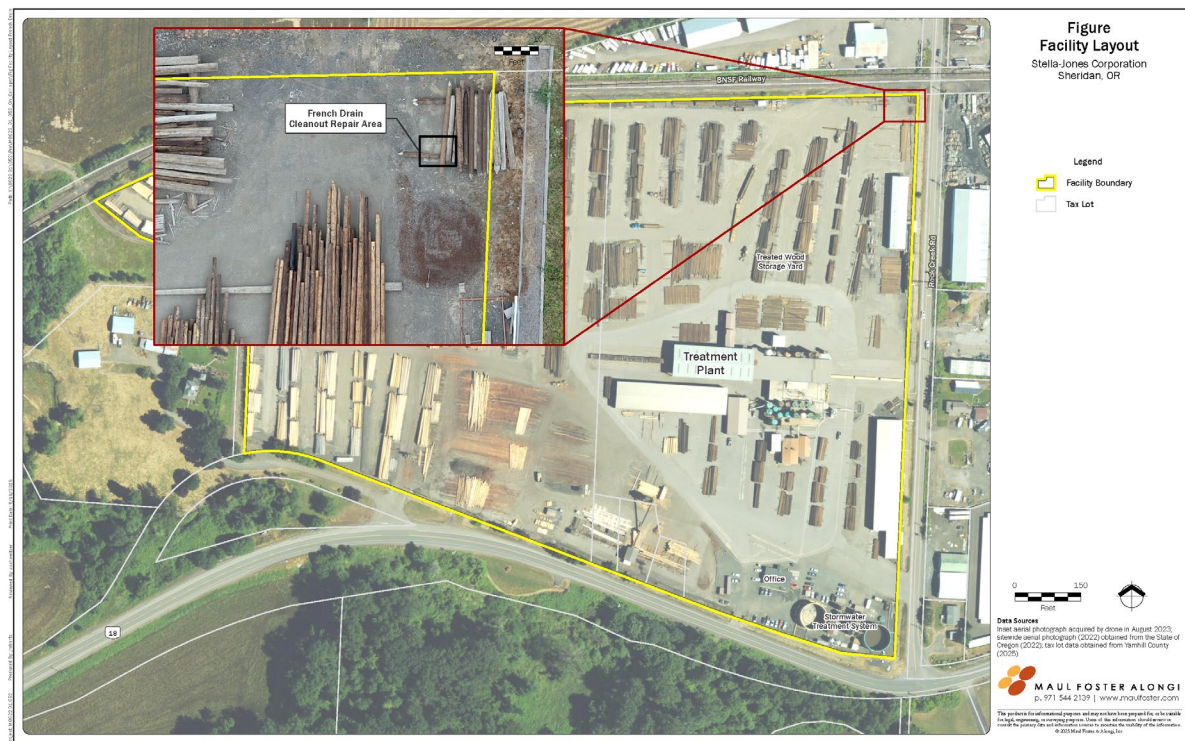


Figure: French Drain Cleanout repair area.

Field Activities

Soil from excavation activities will be stockpiled nearby for use as backfill material. After the repair is complete, the remaining soil will be stockpiled pending characterization for off-site disposal. Soil will be stockpiled under a rolling stock shed on 6-millimeter (mm) plastic sheeting, covered with 6 mm plastic sheeting, and weighted down with sandbags (or other equivalent method) to prevent any potential erosion and dust generation.

MFA proposes two methods for sampling the stockpile based on the amount of material generated. If the stockpile is less than approximately 10 cubic yards, soil will be sampled by collecting five random discrete samples that are then field composited into a single composite sample. Sample increments

will be collected using a clean stainless-steel measuring cup to ensure a consistent volume of material is collected for each increment.

If the stockpile is greater than approximately 10 cubic yards, soil will be sampled using an incremental sampling methodology (ISM) approach following current DEQ guidance. The stockpile will be considered a single decision unit and the ISM sample will consist of 50 increments of approximately 20 grams each for a total of approximately 1000 grams, with one replicate sample collected. Sample increments will be collected using a laboratory provided 2-ounce glass jar of approximately 20 grams each for a total of approximately 1000 grams to ensure a consistent volume of material is collected for each increment. The sample increment locations will be selected using a systematic random sampling scheme in accordance with DEQ's Decision Unit Characterization guidance, to be determined in the field based on the dimensions and volume of the stockpile.¹ If an ISM approach is used, MFA will provide a photo(s) of the stockpile and the sampling approach used for sampling.

The samples will be combined into one laboratory-provided sample container and placed on ice. Samples will be submitted under chain-of-custody protocols to Apex Laboratories, LLC for ISM sample processing and chemical analysis.

Soil Characterization Process

To assess concentrations of hazardous constituents, as described in the SMPP for the Site, soil samples will be analyzed for total arsenic by EPA Method 6020B, dioxins by EPA Method 8290A, and pentachlorophenol by EPA Method 8270E. Results will be evaluated against excavation worker and occupational worker RBCs (soil ingestion, dermal contact, and inhalation). Based on the analytical results, MFA will follow the soil profile decision tree (Figure 1 of the SMPP) to identify a soil disposal pathway for DEQ approval.

¹ DEQ. 2020. *Decision Unit Characterization*. Oregon Department of Environmental Quality. September 14.